

Presidio of San Francisco Restoration Advisory Board (RAB) Archive
RAB Documents Page

Resolutions

Introduction and Index

This section of the RAB Documents Page contains eight resolutions approved by citizen members of the Restoration Advisory Board between 1997 and 2014. Some of these resolutions are cited in the Presidio of San Francisco Restoration Advisory Board Final Report, which can be found at this link: [Final Report](#)

The purpose of the RAB was to provide community advice and a forum for public discussion of the environmental cleanup of the Presidio, a 1,491-acre former U.S. Army base that became a national park in 1994. The remediation of petroleum contamination, hazardous substances and lead-based paint in soil was begun by the Army in the 1980s and completed by the Presidio Trust between 1999 and 2014.

The formal board resolutions were one of several ways in which RAB citizen members could comment on remediation matters. Other avenues included group and individual comment letters submitted during public comment periods for cleanup planning documents; advisory letters; and discussion during RAB meetings. (A set of 20 examples of comment and advisory letters can be seen in the Comment Letters section of this page: [Comment Letters](#))

Our RAB enacted resolutions on an occasional basis in cases of the most serious concerns or important junctures in cleanup matters. Some of the resolutions were related to issues of process that were outside the scope of the comment letters submitted during official comment periods on specific cleanup documents. The resolutions thus served as a supplement to the comment letters in the RAB's role of providing community advice.

The resolutions were typically about one page long and were circulated among RAB community members in draft form in advance of the meeting at which they were approved. To achieve as much consensus as possible, the resolutions were usually discussed and refined during the circulation process and at committee meetings as well as at the board meeting at which they were offered for a vote.

The second resolution to be approved by the RAB, the Landfill Closure Resolution of 1997, was one of the RAB's most important statements. It advocated clean closure, or full excavation, of contamination in waste landfills rather than containment of the contamination in place. RAB community members cited the resolution in later comment letters on various documents and also used it in discussions with neighborhood, environmental and civic groups.

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Resolutions

The final resolution enacted by RAB community members was approved at the April 8, 2014 meeting at which the RAB formally adjourned, or disbanded, because the remediation was essentially complete. The resolution, entitled “Commendation to Agencies for the Cleanup of Presidio of San Francisco,” stated the reasons for the RAB’s adjournment and commended the government agencies and their project managers for their accomplishments in carrying out the complex program.

More information about the background and context of the resolutions can be found in the RAB Final Report at this link: [Final Report](#)

The resolutions in this file are as follows:

1. January 14, 1997, Coast Guard Station Resolution
2. May 13, 1997, Landfill Closure Resolution
3. August 11, 1998, Army Proposed Process and Schedule Resolution
4. September 14, 1999, Building 637 Working Group Process Resolution
5. October 14, 2003, Mountain Lake Cleanup and Restoration Resolution
6. February 14, 2006, Summit Meeting Resolution
7. December 9, 2008, Landfills 8 and 10 Resolution
8. April 8, 2014, Adjournment and Commendation of Agencies Resolution

Coast Guard Station Resolution

The advice of the Restoration Advisory Board is to recommend that the Army take immediate steps to commence and take responsibility of cleanup and perform the cleanup of the former Coast Guard Station.

Adopted by an 11-2 vote of RAB community members on January 14, 1997

Note: This first resolution reflected concern by RAB community members about a dispute between the Army and the Coast Guard on the timing and funding of investigation of possible residual waste-oil contamination at the former U.S. Coast Guard Station at the western end of Crissy Field. The delay in resolving the cleanup issue appeared to be jeopardizing the start of the Crissy Field restoration project planned by the National Park Service and Golden Gate National Parks Conservancy. The enactment of this resolution led RAB community members to develop a process for proposing resolutions that were typically one page long and circulated in advance of meetings.

Presidio of San Francisco Restoration Advisory Board

RESOLUTION

Excavation, Recycling and Off-site Consolidation of Presidio Landfills, Fill Sites and Disturbed Areas.

WHEREAS, the Presidio's future reuse and status as a National Park must be carefully protected so that it meets its fiscal goals of self-sufficiency; and

WHEREAS, the containment of waste at the Presidio of San Francisco may be inconsistent with the vision, goals and reuse scenarios of the Park; and

WHEREAS, institutional controls at the landfills, fill sites and disturbed areas would limit reuse options; and

WHEREAS, the location of Presidio landfills, fill sites and disturbed areas in ravines, valleys and low-lying areas where fresh water is known to flow yields ongoing pollution to the environment; and

WHEREAS, the landfills, fill sites and disturbed areas at the Presidio contain a variety of recyclable materials and that if those materials were recycled, when appropriate and feasible, the costs of excavation and offsite disposal would be substantially reduced; and

WHEREAS, excavation and off-site disposal of landfill, fill site and disturbed area materials has been routinely dismissed as prohibitively expensive without sufficient written estimates, while expenditure estimates of containing wastes on site have not fully considered all the costs of long-term monitoring and maintenance; and

WHEREAS, remedies have been selected for certain Presidio landfill sites without community acceptance; now, therefore

BE IT RESOLVED THAT the Presidio of San Francisco Restoration Advisory Board fully endorses the April 1997, Presidio Landfill Closure Principles; and

BE IT FURTHER RESOLVED THAT, with few exceptions, and until proven otherwise, the Presidio landfills, fill sites and disturbed areas should be excavated, fill materials recycled where appropriate, and remaining materials and hazardous waste consolidated at modern, appropriately designed and monitored off-site disposal facilities.

Presidio of San Francisco Landfill Closure Principles

1. Consolidate—Reduce Widely Separated Extent of Wastes

Debris fill, garbage and hazardous waste is spread over seventeen separate Presidio sites where people, plants and animals can be exposed, now or in the future. Consolidation of at least some Presidio landfills onsite or off-site would considerably reduce or, more appropriately, eliminate the widely separated extent of wastes at the Presidio.

2. Relocate Small Landfills

Where landfill areas and volumes are small they can be readily moved. The EPA's April 1996 Guidance, "Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills" recommends that landfills not be moved if they are over 100,000 cubic yards in volume. Most of the Presidio landfills are less than 10,000 cubic yards—none are over 100,000 cubic yards (see attached Table 9.0-1 from the Army's Final Remedial Investigation Report, Presidio Main Installation, January 1997). Therefore, according to the guidance all Presidio landfills are candidates for excavation and off-site disposal.

3. Reuse of National Park Lands is Unrestricted

Reuse of the Presidio National Park lands are thoroughly described in the Park Service's General Management Plan Amendment, July 1994 and updated by such reports as the Final Draft Wetland and Riparian Corridor Restoration Feasibility Study, August 1995. These plans required considerable time and effort to develop and involved a great degree of community input. Nevertheless, as the final plans for a particular site emerge, the details may vary, sometimes significantly, from the initial concept. Flexibility for changing reuse scenarios ensures that the Park and the Presidio Trust may employ the best possible site reuse for the Park so that it may achieve its self-sufficiency needs. Therefore, it remains essential that deed restrictions or institutional controls are not imposed on Presidio contamination sites, limiting the reuse of the property and diminishing its value for the millions of expected Park visitors.

In addition, a 1991 San Francisco Regional Water Quality Control Board Policy regarding foundation piles through closed landfills (see attached) illuminates hidden costs for construction at capped landfill sites, and suggests that there will likely be substantial compliance costs if Presidio decision-makers decide to build on landfills in the future. These future compliance costs may severely limit reuse at the Presidio landfills and should be considered.

4. Clear Waste from Groundwater Saturation Zones

As indicated in Table 9.0-1 from the Presidio Remedial Investigation (attached), a substantial number of the Presidio landfills were created by dumping debris, garbage and hazardous waste in ravines and low-lying areas where small creeks and seeps existed. These freshwater saturation zones are now the sites of potential ongoing contamination. By relocating wastes in an appropriately designed and monitored off-site disposal facility with modern leachate collection systems, Presidio surface water and percolating groundwater will remain free from future contamination. Wastes should, therefore, be removed from water saturation zones where toxic leaching in toxic amounts is more likely to occur.

5. Recycle Building and Construction Debris

Much of the material in Presidio fill sites is described as debris fill and rubble. These materials are now commonly recycled and need not be sent to a landfill. Recycling materials when appropriate and feasible would reduce the cost of off-site disposal.

6. Consider Cost of Remedy Only After Other Threshold Issues are Resolved

The community must assume that a containment presumptive remedy has been selected at Landfill E, since monies have been spent designing that remedy. According to the EPA's April 1996 Guidance, "Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills," land reuse and community acceptance should be ascertained before a presumptive remedy is implemented. To implement a presumptive remedy, the Administrative Record must contain site-specific information documenting how the presumptive remedy satisfies, among other site-specific remedy selection criteria, community acceptance. Community acceptance is based on examining a site for expected future reuse and alternative remedies for cleanup. The Army should not claim a priori that the cost of excavation and off-site disposal is prohibitive and therefore, excavation is not to be considered—particularly when the community is not given the detailed cost information to evaluate. Once given the detailed cost information the community can assess whether costs for containing wastes in place include sufficient funding for monitoring and cap maintenance. Annual maintenance costs for containing and monitoring landfills could be considerable and would be a permanent additional burden to the Park, suggesting that a permanent removal action may be a more appropriate remedy. Therefore, remedy cost should be considered after all alternatives are reviewed for site reuse and community acceptance.

7. The Presidio has Special Status as a National Park

The Army has stated that it fully recognizes the importance of the historical and recreational resources at the Presidio and its unique status among Base Realignment and Closure (BRAC) sites. However, there is no indication in any reuse scenario described to date that containment of contamination sites on the Presidio furthers some significant future reuse purpose. The containment of waste at the Presidio of San Francisco is entirely inconsistent with the vision, goals and reuse scenarios of the Park. In consideration of the Park's future reuse needs, landfills, fill sites and disturbed areas should be excavated and disposed of off-site.

8. The Cleanup Remedy is Acceptable to the Community

According to the National Contingency Plan each alternative is assessed against nine evaluation criteria. The ninth criterion, one of the so-called modifying criteria, is that an alternative should be acceptable to the community. The final disposition of Presidio landfills should, therefore, be acceptable to community representatives. While not the only body capable of giving community input regarding the Presidio cleanup effort, the Restoration Advisory Board is the Army-sponsored, community input advisory group and should therefore be consulted. The Army has not conferred with community representatives from the Restoration Advisory Board regarding disposition of the Presidio landfills. Rather, it has pursued a course of implementing a presumptive remedy, particularly at Landfill E, without community acceptance. As with any site at the Presidio, landfill cleanup alternatives and presumptive remedies must pass the criterion of community acceptance.

Presidio of San Francisco Restoration Advisory Board

RESOLUTION

Army Proposed Process and Schedule for Feasibility Study/Remedial Action Plan

WHEREAS, the U.S. Army has over the past six years authored five separate Remedial Investigations and two Feasibility Studies for Presidio Main Installation sites at considerable cost to the U.S. taxpayer; and

WHEREAS, In September 1997 the Presidio stakeholders, including community members of the Presidio Restoration Advisory Board, the National Park Service, the Presidio Trust, local, state and federal regulators, and various local community organizations and citizens submitted formal written comments on the Army's Main Installation Feasibility Study. In this document the U.S. Army generally proposed to contain and monitor waste in place, and prevent access to important areas of the Presidio through the widespread use of institutional controls. To date, stakeholders have not received formal written responses to their comments; and

WHEREAS, the U.S. Army proposes spending six additional months to complete yet another costly Feasibility Study (estimated to exceed half a million dollars) before having responded in writing to comments on the previous document; and

WHEREAS, the USEPA has called for adherence to standard practice for base cleanups, i.e., to reach Base Cleanup Team consensus prior to release of a Feasibility Study for public review; and

WHEREAS, if the Base Cleanup Team has responses to comments in hand before rewriting the Main Installation Feasibility Study they will be better able to reach consensus; and

WHEREAS, the U.S. Army proposes to simultaneously submit for public review three complex and crucial documents: a third attempt at the Feasibility Study, a response to comments on the previous Feasibility Study, and a Draft Remedial Action Plan. Despite previous assurances and agreements to the contrary, the U.S. Army now proposes to release cleanup decision documents for public review without prior stakeholder consensus on cleanup strategies. The U.S. Army proposal permits only a single 45-day public review for all three documents without the opportunity of further public input, an approach that we find inadequate. The U.S. Army proposes to release these important decision documents during the middle of the 1998 winter holiday season, in spite of a previous understanding that such timing is unsuitable; and

WHEREAS, Presidio stakeholders have spent considerable time, money and energy presenting the U.S. Army with information about the proposed reuse of Presidio property as a national park and have suggested appropriate cleanup remedies to meet future reuse needs; now therefore,

BE IT RESOLVED THAT the Presidio of San Francisco Restoration Advisory Board finds the U.S. Army's proposed Feasibility Study/Remedial Action Plan process and schedule to be inefficient for stakeholder input and inadequate for meeting community concerns regarding cleanup; and

BE IT FURTHER RESOLVED THAT, the Presidio of San Francisco Restoration Advisory Board requests the U.S. Army to begin discussions with the Presidio stakeholder group concerning proposed remedies for Main Installation sites by September 8, 1998.

BE IT FURTHER RESOLVED THAT, the Presidio of San Francisco Restoration Advisory Board requests the U.S. Army to provide stakeholders with detailed, written responses to their prior Feasibility Study comments by September 15, 1998.

Presidio of San Francisco Restoration Advisory Board

RESOLUTION

Public Participation, Building 637 Working Group Process

September 14, 1999

WHEREAS, the Building 637 area (the "site") was formerly a fueling station that leaked petroleum hydrocarbons to the environment at the Presidio of San Francisco adjacent to Crissy Field, contaminating soil and groundwater; and

WHEREAS, community members of the Presidio Restoration Advisory Board ("PSF RAB") did not concur with previous cleanup remedies proposed by the U.S. Army for the site; and

WHEREAS, the Presidio Trust recently assumed Lead Agency status for completing cleanup activities at the Presidio from the U.S. Army; and

WHEREAS, community members of the PSF RAB sought and received from the Presidio Trust, a forum (hereinafter, the "Working Group") for discussing remedial activities at the site. The Building 637 site cleanup process would be the first conducted by the Presidio Trust as the Lead Agency; and

WHEREAS, the Working Group presented Presidio RAB members with several opportunities to participate meaningfully in the decision-making process for the site; and

WHEREAS, meetings of the Working Group were open, frank and respectful; and

WHEREAS, opinions, remarks and comments by the community were taken seriously and incorporated into the final remedial design and the final Corrective Action Plan for the site; and

WHEREAS, the Working Group developed a solution that was a better and more efficient use of federal funds than the previous Army design; and

WHEREAS, this public input process, while challenging, imperfect and under tight time constraints, was a significant, positive, 180 degree turnaround from previous RAB participation experiences at the Presidio; now therefore,

BE IT RESOLVED THAT the Presidio of San Francisco Restoration Advisory Board appreciates the public participation efforts by staff of the Presidio Trust and staff from the National Park Service;

BE IT FURTHER RESOLVED THAT the Presidio of San Francisco Restoration Advisory Board finds the RAB participation approach conducted by the Presidio Trust to be "on track" and the PSF RAB wishes to continue working in this fashion with the Trust as a full partner in the cleanup process; and

BE IT FURTHER RESOLVED THAT, the Presidio of San Francisco Restoration Advisory Board will continue to search for ways to further improve the public participation process and engage in a dialogue with the Presidio Trust and National Park Service to make incremental improvements as agreed upon by all parties involved.

PRESIDIO RESTORATION ADVISORY BOARD

Community Members

Resolution: Mountain Lake Cleanup and Restoration

October 2003

WHEREAS, the Presidio of San Francisco is a unique and magnificent national park with exceptional natural and cultural resources, situated in an urban setting; and,

WHEREAS, Mountain Lake is a beautiful natural area within the Presidio, a site of keen public interest and long-term recreational use, now undergoing planning and design phases of toxic contamination cleanup and natural resource restoration; and

WHEREAS, there is sufficient evidence to conclude that there has been and will be future contamination of Mountain Lake due to its proximity to a major highway and the associated rain-water runoff; and,

WHEREAS, restoration progress is jeopardized due to variety of difficult challenges, including acceptance of cleanup responsibility by clearly involved-parties; and,

WHEREAS, parties concerned with the cleanup and restoration of Mountain Lake understand that it is time to move the project forward by finishing design plans and budgets, mobilizing public action, organizing government agency activity, and requesting supportive legislation from state government.

THEREFORE, BE IT RESOLVED THAT the Community members of the Presidio Restoration Advisory Board (RAB) request that the Presidio Trust organize remediation and restoration teams to complete preliminary design plans and budgets for the Mountain Lake project within six months after the date of this resolution; and,

BE IT FURTHER RESOLVED THAT the Community members of the Presidio RAB will, at an appropriate time in the near future, encourage its individual members to inform and work with local community groups to support completion of the project, including the prospect of state legislation to mitigate future contamination and to secure funding from responsible parties for the cleanup of Mountain Lake; and,

BE IT FURTHER RESOLVED THAT the Community members of the Presidio RAB will, at an appropriate time in the near future, support timely actions by upper management officials and directors of government agencies, to promote state legislation for the purpose of mitigating future contamination and securing funding from responsible parties for the cleanup of Mountain Lake.

PRESIDIO RESTORATION ADVISORY BOARD

Community Members

Resolution: Summit Meeting

February 2006

WHEREAS, the Presidio of San Francisco is a unique and magnificent national park with exceptional natural and cultural resources, highly valued by millions of visitors annually; and

WHEREAS, the Presidio Trust has been the lead agency for the remediation of the Presidio since 1999 and for that purpose has received \$99 million from the Army to complete the program, the interest on which is more than \$11 million to date and is expected ultimately to exceed \$18 million; and

WHEREAS, the Presidio Restoration Advisory Board (RAB) community members appreciate the extensive efforts and accomplishments by the Presidio Trust to manage the program, by the National Park Service to participate comprehensively, and by the regulatory agencies to provide steadfast oversight and review; and

WHEREAS, community members are informed that, based on remediation program outlays to date of about \$45 million, remaining funds, including interest, are no longer adequate to complete the program as budgeted, and that no reasonable alternatives for additional funding have thus far been identified; and

WHEREAS, all parties involved in the remediation program including the Presidio Trust, the National Park Service, the California Department of Toxic Substances Control, the San Francisco Regional Water Quality Control Board and the Presidio RAB have similar goals to remediate the Presidio within budget and within a reasonable and appropriate timeframe; and

WHEREAS, the remediation program is in jeopardy of not fully accomplishing its stated goals within budget and within a reasonable timeframe;

THEREFORE, BE IT RESOLVED THAT the community members of the Presidio RAB recommend that a high-level meeting be convened by the Presidio Trust to engage Presidio stakeholders -- the National Park Service, the Presidio Trust, the regulatory agencies, and the Presidio RAB -- in a concerted dialogue with appropriate written reporting to assess current processes and procedures of the Presidio remediation program (e.g., budgets, schedules, priorities, review processes, expenditure patterns and screening process for alternative remedies) with a goal to streamline the overall procedure and correct or eliminate procedural weaknesses (e.g., unnecessary delays, duplication of effort), so that effective use of the remaining funds will realize mutually shared goals.

BE IT FURTHER RESOLVED THAT the community members of the Presidio RAB maintain that the Park must be fully remediated, that we believe solutions exist to accomplish a comprehensive remediation within the available funds and that we believe that our mutual goals can be achieved through open-mindedness, creativity and cooperation among all the parties.

Resolution approved by a unanimous vote of RAB community members at the RAB meeting of February 14, 2006

PRESIDIO RESTORATION ADVISORY BOARD

Community Members

Resolution: Landfills 8 and 10

December 2008

WHEREAS, the Presidio of San Francisco is a unique and magnificent national park with exceptional natural and cultural resources, highly valued by millions of visitors annually; and

WHEREAS, the Presidio's use and enjoyment as a National Park must be carefully protected now and into the future; and

WHEREAS, the containment of waste at the Presidio of San Francisco is generally inconsistent with the vision, goals and reuse scenarios of the Park; and

WHEREAS, institutional controls at the landfills, fill sites and disturbed areas could limit reuse options including the complete restoration of natural and cultural resources; and

WHEREAS, in 1997, community members of the Presidio Restoration Advisory Board adopted a resolution making it the policy of the Board that the preferred remedy for clean up of the Presidio remediation sites be removal of contaminated waste and clean closure; copies of that resolution and of the Presidio Landfill Closure Principles mentioned therein are attached and hereby readopted by the Restoration Advisory Board; and

WHEREAS, Landfill 8 contains approximately 30,000 cubic yards of contaminated waste which was deposited over the historic Merchant Marine Hospital cemetery and which the Presidio Trust proposes to maintain in place in perpetuity; and

WHEREAS, community members of the Presidio Restoration Advisory Board have consistently recommended the removal of Landfill 8 waste that continues to cover the historic merchant marine cemetery; and

WHEREAS, community members of the Presidio Restoration Advisory Board, in a spirit of compromise, have agreed with the Presidio Trust proposal to leave waste materials in place at Landfill 10 in order to achieve a cost-effective remedy that balances parking requirements at the Public Health Service Hospital redevelopment with the primary goal of protecting human health and the environment; and

WHEREAS, the Presidio Trust proposes to consolidate Landfill 10 soil and waste without a clean soil cover on the Landfill 10 slope; which may compromise the effectiveness of the Landfill 10 remedy to protect human health and the environment; now

THEREFORE, BE IT RESOLVED THAT, as to Landfill 8, the community members of the Presidio Restoration Advisory Board strongly recommend that contaminated waste in Landfill 8 be removed rather than covered in place, in order to provide permanent protection of human health and the environment and to remove the waste and debris that covers the historic cemetery; and

BE IT FURTHER RESOLVED THAT as to Landfill 10, the community members of the Presidio Restoration Advisory Board strongly recommend that, at the time the consolidated soil and waste from the slope is cleaned of large debris, it be tested to determine if it meets acceptable ecological and human safety standards; and that if it fails to meet such standards, a layer of two feet of clean soil be placed on the slope to provide greater certainty of protection of human health and the environment.

FINAL – For Public Distribution

On December 9, 2008 RAB community members unanimously approved this resolution by a vote of 16-0, with 1 member absent.

Presidio of San Francisco Restoration Advisory Board

RESOLUTION

Excavation, Recycling and Off-site Consolidation of Presidio Landfills, Fill Sites and Disturbed Areas.

WHEREAS, the Presidio's future reuse and status as a National Park must be carefully protected so that it meets its fiscal goals of self-sufficiency; and

WHEREAS, the containment of waste at the Presidio of San Francisco may be inconsistent with the vision, goals and reuse scenarios of the Park; and

WHEREAS, institutional controls at the landfills, fill sites and disturbed areas would limit reuse options; and

WHEREAS, the location of Presidio landfills, fill sites and disturbed areas in ravines, valleys and low-lying areas where fresh water is known to flow yields ongoing pollution to the environment; and

WHEREAS, the landfills, fill sites and disturbed areas at the Presidio contain a variety of recyclable materials and that if those materials were recycled, when appropriate and feasible, the costs of excavation and offsite disposal would be substantially reduced; and

WHEREAS, excavation and off-site disposal of landfill, fill site and disturbed area materials has been routinely dismissed as prohibitively expensive without sufficient written estimates, while expenditure estimates of containing wastes on site have not fully considered all the costs of long-term monitoring and maintenance; and

WHEREAS, remedies have been selected for certain Presidio landfill sites without community acceptance; now, therefore

BE IT RESOLVED THAT the Presidio of San Francisco Restoration Advisory Board fully endorses the April 1997, Presidio Landfill Closure Principles; and

BE IT FURTHER RESOLVED THAT, with few exceptions, and until proven otherwise, the Presidio landfills, fill sites and disturbed areas should be excavated, fill materials recycled where appropriate, and remaining materials and hazardous waste consolidated at modern, appropriately designed and monitored off-site disposal facilities.

Presidio of San Francisco Landfill Closure Principles

1. Consolidate—Reduce Widely Separated Extent of Wastes

Debris fill, garbage and hazardous waste is spread over seventeen separate Presidio sites where people, plants and animals can be exposed, now or in the future. Consolidation of at least some Presidio landfills onsite or off-site would considerably reduce or, more appropriately, eliminate the widely separated extent of wastes at the Presidio.

2. Relocate Small Landfills

Where landfill areas and volumes are small they can be readily moved. The EPA's April 1996 Guidance, "Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills" recommends that landfills not be moved if they are over 100,000 cubic yards in volume. Most of the Presidio landfills are less than 10,000 cubic yards—none are over 100,000 cubic yards (see attached Table 9.0-1 from the Army's Final Remedial Investigation Report, Presidio Main Installation, January 1997). Therefore, according to the guidance all Presidio landfills are candidates for excavation and off-site disposal.

3. Reuse of National Park Lands is Unrestricted

Reuse of the Presidio National Park lands are thoroughly described in the Park Service's General Management Plan Amendment, July 1994 and updated by such reports as the Final Draft Wetland and Riparian Corridor Restoration Feasibility Study, August 1995. These plans required considerable time and effort to develop and involved a great degree of community input. Nevertheless, as the final plans for a particular site emerge, the details may vary, sometimes significantly, from the initial concept. Flexibility for changing reuse scenarios ensures that the Park and the Presidio Trust may employ the best possible site reuse for the Park so that it may achieve its self-sufficiency needs. Therefore, it remains essential that deed restrictions or institutional controls are not imposed on Presidio contamination sites, limiting the reuse of the property and diminishing its value for the millions of expected Park visitors.

In addition, a 1991 San Francisco Regional Water Quality Control Board Policy regarding foundation piles through closed landfills (see attached) illuminates hidden costs for construction at capped landfill sites, and suggests that there will likely be substantial compliance costs if Presidio decision-makers decide to build on landfills in the future. These future compliance costs may severely limit reuse at the Presidio landfills and should be considered.

4. Clear Waste from Groundwater Saturation Zones

As indicated in Table 9.0-1 from the Presidio Remedial Investigation (attached), a substantial number of the Presidio landfills were created by dumping debris, garbage and hazardous waste in ravines and low-lying areas where small creeks and seeps existed. These freshwater saturation zones are now the sites of potential ongoing contamination. By relocating wastes in an appropriately designed and monitored off-site disposal facility with modern leachate collection systems, Presidio surface water and percolating groundwater will remain free from future contamination. Wastes should, therefore, be removed from water saturation zones where toxic leaching in toxic amounts is more likely to occur.

5. Recycle Building and Construction Debris

Much of the material in Presidio fill sites is described as debris fill and rubble. These materials are now commonly recycled and need not be sent to a landfill. Recycling materials when appropriate and feasible would reduce the cost of off-site disposal.

6. Consider Cost of Remedy Only After Other Threshold Issues are Resolved

The community must assume that a containment presumptive remedy has been selected at Landfill E, since monies have been spent designing that remedy. According to the EPA's April 1996 Guidance, "Application of the CERCLA Municipal Landfill Presumptive Remedy to Military Landfills," land reuse and community acceptance should be ascertained before a presumptive remedy is implemented. To implement a presumptive remedy, the Administrative Record must contain site-specific information documenting how the presumptive remedy satisfies, among other site-specific remedy selection criteria, community acceptance. Community acceptance is based on examining a site for expected future reuse and alternative remedies for cleanup. The Army should not claim a priori that the cost of excavation and off-site disposal is prohibitive and therefore, excavation is not to be considered—particularly when the community is not given the detailed cost information to evaluate. Once given the detailed cost information the community can assess whether costs for containing wastes in place include sufficient funding for monitoring and cap maintenance. Annual maintenance costs for containing and monitoring landfills could be considerable and would be a permanent additional burden to the Park, suggesting that a permanent removal action may be a more appropriate remedy. Therefore, remedy cost should be considered after all alternatives are reviewed for site reuse and community acceptance.

7. The Presidio has Special Status as a National Park

The Army has stated that it fully recognizes the importance of the historical and recreational resources at the Presidio and its unique status among Base Realignment and Closure (BRAC) sites. However, there is no indication in any reuse scenario described to date that containment of contamination sites on the Presidio furthers some significant future reuse purpose. The containment of waste at the Presidio of San Francisco is entirely inconsistent with the vision, goals and reuse scenarios of the Park. In consideration of the Park's future reuse needs, landfills, fill sites and disturbed areas should be excavated and disposed of off-site.

8. The Cleanup Remedy is Acceptable to the Community

According to the National Contingency Plan each alternative is assessed against nine evaluation criteria. The ninth criterion, one of the so-called modifying criteria, is that an alternative should be acceptable to the community. The final disposition of Presidio landfills should, therefore, be acceptable to community representatives. While not the only body capable of giving community input regarding the Presidio cleanup effort, the Restoration Advisory Board is the Army-sponsored, community input advisory group and should therefore be consulted. The Army has not conferred with community representatives from the Restoration Advisory Board regarding disposition of the Presidio landfills. Rather, it has pursued a course of implementing a presumptive remedy, particularly at Landfill E, without community acceptance. As with any site at the Presidio, landfill cleanup alternatives and presumptive remedies must pass the criterion of community acceptance.

Presidio of San Francisco Restoration Advisory Board
Community Member Resolution

**Commendation to Agencies
for the
Cleanup of Presidio of San Francisco**

WHEREAS the cleanup of contaminated soil and groundwater has now been essentially achieved at the Presidio of San Francisco, a former U.S. Army base converted to a national park, and the environmental remediation program is now concluding its work; and

WHEREAS the Presidio's structures, including residential and non-residential buildings, have now been made safe from the hazards of asbestos, lead-based paint, and lead-based paint in soil; and

WHEREAS the Presidio now has twelve restored natural areas for the public to enjoy, where former abandoned military landfills have been removed by clean closure; and

WHEREAS the lead- and petroleum-contaminated sediments have now been removed from Mountain Lake, thereby allowing the lake restoration project to proceed; and

WHEREAS the community members of the Restoration Advisory Board have witnessed the complex task that government agencies faced during the last two decades and their diligent efforts to clean up contamination of the Presidio, its buildings and natural areas; and

WHEREAS the agencies conducting and overseeing the cleanup seriously considered the opinions, investigations and comments by the community members, and the agency project managers endeavored to incorporate community advice into program goals and designs; and

WHEREAS the public participation process, during the cleanup of the Presidio, provided a significant civic engagement experience and became a successful model of community involvement;

NOW THEREFORE, BE IT RESOLVED THAT community members hereby commend the public participation efforts by the Presidio Trust, National Park Service, California Department of Toxic Substances Control, California Regional Water Quality Control Board, U.S. Environmental Protection Agency, and U.S. Army; and

BE IT FURTHER RESOLVED THAT community members hereby commend the agency project managers, past and present, for their perseverance and innovative contributions in accomplishing the successful environmental cleanup of the Presidio; and

BE IT FURTHER RESOLVED THAT the Presidio of San Francisco Restoration Advisory Board is adjourning with the knowledge that these dedicated agencies will continue diligently to investigate and remediate any future discovery of contamination of the Presidio and provide for effective public participation. RAB community members are disbanding with confidence that visitors to this new national park will enjoy a safe environment now and in the future.

Final meeting of the Presidio of San Francisco Restoration Advisory Board on April 8, 2014